

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITE HERE HEALTH, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 17 C 6865
)	
LE PERIGORD, INC., d/b/a LE PERIGORD)	JUDGE ANDREA R. WOOD
RESTAURANT,)	
)	
Defendant.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on November 20, 2018, request this Court enter judgment against Defendant, LE PERIGORD, INC., d/b/a LE PERIGORD RESTAURANT. In support of this Motion, Plaintiffs state:

1. On November 20, 2018, this Court entered default against Defendant and granted Plaintiffs' request for an order directing an audit of the Defendant's payroll books and records for the time period January 1, 2015 through March 11, 2017. The Court also entered an order that judgment would be entered after the completion of the audit.

2. On or about April 15, 2019, Plaintiffs' auditors completed the audit. Preliminary findings were sent to the Defendant's attorney on April 15, 2019. The final audit findings were sent to the Defendant's attorney on May 17, 2019. The audit findings show that the Defendant is delinquent in contributions to the Funds in the amount of \$158,741.09. (See Affidavit of Debbie Sippos).

3. Additionally, the amount of \$31,748.21 is due for liquidated damages and \$3,531.88 is due for interest. (Sippos Aff. Par. 4). Plaintiffs' auditors charged Plaintiffs \$4,168.05 to perform the audit examination and complete the report (Sippos Aff. Par. 5).

4. In addition, Plaintiffs' firm has expended \$1,148.59 for costs and \$11,875.00 for attorneys' fees in this matter. (See Affidavit of Laura M. Finnegan).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$211,212.82.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$211,212.82.

/s/ Laura M. Finnegan

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 5th day of June 2019:

Mr. Georges Briguet
415 E. 52nd Street, Apartment 5JC
New York, NY 10022

Mr. Christopher P. Briguet
15847 81st Street
Howard Beach, NY 11414-2920

I further certify that I have served the above-referenced document by both United States Mail and Email to the following non-CM-ECF participant on or before the hour of 5:00 p.m., this 5th day of June 2019:

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